

Mr J. Mark Erler  
Erler Industries, Inc.  
P. O. Box 219  
North Vernon, In 46514

Re: **079-12803**  
Minor Source Modification to:  
Part 70 Operating Permit No.: **T 079-7572-00010**

Dear Mr. Erler:

Erler Industries, Inc. was issued Part 70 operating permit **T 079-12803-00010** on September 23, 1998 for an operation which spray paints plastic and metal parts. An application to modify the source was received on October 5, 2000. Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction at the source:

Located in Plant 1 (418 Stockwell Street, North Vernon, Indiana 47265):

- (1) One (1) paint line, identified as Line 1, two (2) manual paint booths, identified as EU1 and EU2, respectively and two (2) robot paint booths, identified as EU17 and EU18, respectively, equipped with dry filters for particulate matter control, exhausting to stacks S/V1, S/V2, S/V17, respectively, EU18 exhausts to S/V18a and S/V18b, capacity: 327 parts per hour, each.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Management (OAM).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit  
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless

modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The proposed operating conditions applicable to these emission units are attached to this Source Modification approval. These proposed operating conditions shall be incorporated into the Part 70 operating permit as an administrative amendment in accordance with 326 IAC 2-7-10.5(l)(1) and 326 IAC 2-7-11.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter contact Paula M Cognitore, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

Attachments  
PMC/MES

cc: File - Jennings County  
U.S. EPA, Region V  
Jennings County Health Department  
Air Compliance Section Inspector - D.J. Knotts  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michelle Boner

**PART 70 OPERATING PERMIT  
and ENHANCED NEW SOURCE REVIEW  
OFFICE OF AIR MANAGEMENT**

**Erler Industries, Inc.  
418 Stockwell Street  
North Vernon, Indiana 47265**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T079-7572-00010	
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date: September 23, 1998

First Administrative Amendment 079-10586-00010 issued August 20, 1999

Part 70 First Significant Source Modification: 079-11008-00010	Pages Affected: 4, 5, 6, 19, 34a and 34b supercede 34, 40a Section Added: D.4, 34c and 34d
Issued by: Felicia R. George, Assistant Commissioner Office of Air Management	Issuance Date: September 27, 1999

Part 70 First Minor Source Modification: 079-12803-00010	Pages Affected: 5, 28, 29 and 38
Issued by: Paul Dubenetzky, Permits Branch Chief Office of Air Management	Issuance Date:

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary operation which spray paints plastic and metal parts.

Responsible Official: J. Mark Erler  
Source Address: 418 Stockwell Street, North Vernon, Indiana 47265  
Mailing Address: PO Box 219, North Vernon, Indiana 47265  
SIC Code: 3479, 3663  
County Location: Jennings  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Minor Source, under PSD;  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary operation which spray paints plastic and metal parts consists of the following emission units and pollution control devices:

Located in Plant 1 (418 Stockwell Street, North Vernon, Indiana 47265):

- (1) One (1) paint line, identified as Line 1, two (2) manual paint booths, identified as EU1 and EU2, respectively and two (2) robot paint booths, identified as EU17 and EU-18, respectively, equipped with dry filters for particulate matter control, exhausting to stacks S/V1, S/V2, S/V17, respectively, EU18 exhausts to S/V18a and S/V18b, capacity: 327 parts per hour, each.
- (2) One (1) paint line, identified as Line 2, with two (2) manual paint booths, identified as EU4 and EU5 respectively, with a maximum capacity of 2.5 gallons/hour of paint, with each booth using dry filters for particulate matter control, and each booth exhausting to their respective stacks, identified as S/V4 and S/V5.

Plant 1 utilizes HVLP, air atomized and electrostatic paint guns.

Located in Plant 2 (71 Hayden Pike, North Vernon, Indiana 47265):

- (1) One (1) paint line, identified as Line A, with three (3) manual paint booths, identified as EU6, EU7 and EU8, respectively, with a maximum of two (2) HVLP guns per booth, each booth using dry filters for particulate matter control, and each booth exhausting to their respective stacks, identified as S/V6, S/V7, and S/V8.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

Located in Plant 1 (418 Stockwell Street, North Vernon, Indiana 47265):

- (1) One (1) paint line, identified as Line 1, two (2) manual paint booths, identified as EU1 and EU2, respectively and two (2) robot paint booths, identified as EU17 and EU18, respectively, equipped with dry filters for particulate matter control, exhausting to stacks S/V1, S/V2, S/V17, respectively, EU18 exhausts to S/V18a and S/V18b, capacity: 327 parts per hour, each.
- (2) One (1) paint line, identified as Line 2, with two (2) manual paint booths, identified as EU4 and EU5 respectively, with a maximum capacity of 2.5 gallons/hour of paint, with each booth using dry filters for particulate matter control, and each booth exhausting to their respective stacks, identified as S/V4 and S/V5.

Plant 1 utilizes HVLP, air atomized and electrostatic paint guns.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

- (a) The input VOC to Line 1 (EU1, EU2, EU17 and EU18) shall be limited to 24.0 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) month period. Compliance with this limit makes 326 IAC 8-1-6 not applicable.
- (b) The input VOC to Line 2 (EU4, and EU5) shall be limited to 24.0 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) month period. Compliance with this limit makes 326 IAC 8-1-6 not applicable.
- (c) Compliance with these VOC limits will also make 326 IAC 2-2 and 326 IAC 8-2-9 not applicable.

#### D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from Plant 1 (Line 1 and Line 2) and the insignificant activities listed in Condition D.3.1, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

#### D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for Plant 1 and any dry filters.

### Compliance Determination Requirements

#### D.1.4 Testing Requirements [326 IAC 2-7-6(1), (6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance

#### **D.1.5 Volatile Organic Compounds (VOC)**

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### **D.1.6 Particulate Matter (PM)**

The dry filters for PM control shall be in operation at all times when the two (2) paint lines (Line 1 and Line 2) are in operation.

#### **D.1.7 Monitoring**

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray from the surface coating booth stacks, S/V1, S/V2, S/V3, S/V4, S/V5, S/V17, S/V18a and S/V18b while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.1.8 Record Keeping Requirements [326 IAC 2-7-6]**

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1 and D.1.2.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The volume weighted VOC content of the coatings used for each month;
  - (4) The cleanup solvent usage for each month;

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Erler Industries, Inc.  
Source Address: 418 Stockwell Street, North Vernon, Indiana 47265  
Mailing Address: PO Box 219, North Vernon, Indiana 47265  
Part 70 Permit No.: 079-7572-00010  
Facility: Plant 1/Line 1 (EU1, EU2, EU17, EU18)  
Parameter: VOC  
Limit: 24.0 tons per year

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

## **Indiana Department of Environmental Management Office of Air Management**

### **Technical Support Document (TSD) for a Part 70 Minor Source Modification**

#### **Source Background and Description**

<b>Source Name:</b>	<b>Erler Industries, Inc.</b>
<b>Source Location:</b>	<b>418 Stockwell Street, North Vernon, Indiana 46265</b>
<b>County:</b>	<b>Jennings</b>
<b>SIC Code:</b>	<b>3663</b>
<b>Operation Permit No.:</b>	<b>T 079-7572-00010</b>
<b>Operation Permit Issuance Date:</b>	<b>September 28, 1998</b>
<b>Minor Source Modification</b>	<b>No.: T 070-12803-00010</b>
<b>Permit Reviewer:</b>	<b>Paula M. Cognitore/MES:</b>

The Office of Air Management (OAM) has reviewed a modification application from Erler Industries, Inc. relating to the construction/modification of the following emission units and pollution control devices:

Located in Plant 1 (418 Stockwell Street, North Vernon, Indiana 47265):

One (1) paint line, identified as Line 1, with two (2) manual paint booths, identified as EU1 and EU2, respectively and two (2) robot paint booths, identified as EU17 and EU-18, respectively, equipped with dry filters for particulate matter control, exhausting to stacks S/V1, S/V2, S/V17, respectively, EU18 exhausts to S/V18a and S/V18b, capacity: 327 parts per hour, each.

#### **History**

On October 5, 2000, Erler Industries, Inc. submitted an application to the OAM requesting to replace one (1) manual paint booth (EU3), located in Plant 1 Line 1, with (1) robot paint booth (EU17) and to add an additional robot paint booth(EU18) to Line 1 at their existing plant. Erler Industries, Inc. was issued a Part 70 permit on September 23, 1998. The First Administrative Amendment, AA 079-10586-00010 was issued August 20, 1999, 1999 and their First Significant Source Modification was issued September 27, 1999.

#### **Source Definition**

This company which spray paints plastic and metal parts consists of three (3) plants:

- (a) Plant 1 is located at 418 Stockwell Street, North Vernon, Indiana 47265,
- (b) Plant 2 is located at 71 Hayden Pike, North Vernon, Indiana 47265; and
- (c) Plant 3 is located at 418 Stockwell Street, North Vernon, Indiana 47265.

Since the three (3) plants are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they will be considered one (1) source.

### Enforcement Issue

There are no enforcement actions pending.

### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
S/V17	paint booth	25	2.5	12,000	ambient
S/V18a	paint booth	18	2.0	6,000	ambient
S/Vb	paint booth	18	2.0	6,000	ambient

### Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on October 5, 2000. Additional information was received on October 24, 2000.

### Emission Calculations

See page 1 of 1 of Appendix A of this document for detailed emissions calculations.

### Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	8.59
PM <sub>10</sub>	8.59
SO <sub>2</sub>	0.00
VOC	37.4
CO	0.00

NO <sub>x</sub>	0.00
<b>HAP's</b>	<b>Potential To Emit</b> (tons/year)
Xylene	1.67
Glycol Ethers	4.87
<b>TOTAL</b>	<b>6.54</b>

#### Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(5). Although the potential to emit VOC is greater than 25.0 tons per year the source has agreed to limit VOC emissions to less than 25.0 tons per year.

#### County Attainment Status

The source is located in Jennings County.

<b>Pollutant</b>	<b>Status</b>
PM <sub>10</sub>	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Jennings County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Jennings County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

#### Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	0.00
PM <sub>10</sub>	0.00
SO <sub>2</sub>	0.00
VOC	249
CO	0.180
NO <sub>x</sub>	1.23

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions were based on the Technical Support Document for T 079-11008-00010, issued September 27, 1999, for VOC and the AIRS Facility Subsystem Quick Look Report dated March 30, 1998 for all other pollutants.

#### Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
EU17 and EU18	0.086	0.086	0.00	24.0*	0.00	0.00	6.54
PSD Threshold Level	250	250	250	250	250	250	-

\*Note: This VOC limit includes all of Plant 1/Line1 (EU1, EU2, EU17 and EU18).

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply. The source has a Plant 1/Line 1, which EU17 and EU18 will be apart of, VOC limit of 24.0 tons per year in order to avoid the applicability of 326 IAC 8-1-6. The source is also has an overall source-wide VOC limit of 249 tons per year. Therefore, this source will remain an existing minor PSD source.

#### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

- (b) This source will not be subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, 40 CFR 60, Subpart TTT (Surface Coating of Plastic Parts for Industrial Surface Coating: Surface Coating of Plastic Parts for Business Machines). Since the source surface coats cellular telephones, which are not considered business machines, the requirements of 40 CFR 60, Subpart TTT are not applicable.

### State Rule Applicability - Individual Facilities

#### 326 IAC 2-4.1 (New Source Toxics Control)

EU17 and EU18 do not have the potential to emit more than 10 tons per year of a single HAP and/or 25 tons per year of any combination of HAPs; therefore, 326 IAC 2-4.1 is not applicable.

#### 326 IAC 6-3-2 (Process Operations)

The particulate matter (PM) from EU17 and EU18- shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The dry filters shall be in operation at all times EU17 and EU18 are in operation, in order to comply with this limit.

#### 326 IAC 8-1-6 (New facilities, general reduction requirements)

EU17 and EU18 have the potential to emit more than 25 tons per year of VOC; therefore, 326 IAC 8-1-6 could be applicable. Since the source has accepted a 24.0 tons per year of VOC limit on Plant 1 Line 1, the requirements of 326 IAC 8-1-6 are not applicable.

### Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this modification are as follows:

EU17 and EU18 have applicable compliance monitoring conditions as specified below:

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray from the surface coating booth stacks, S/V1, S/V2, S/V3, S/V4, S/V5, S/V17, S/V18a and S/V18b while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) The dry filters shall be in operation at all times that EU-17and/or EU-18 are in operation.

These monitoring conditions are necessary because the dry filters must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

### Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in bold):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]  
[326 IAC 2-7-5(15)]

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This stationary operation which spray paints plastic and metal parts consists of the following emission units and pollution control devices:

Located in Plant 1 (418 Stockwell Street, North Vernon, Indiana 47265):

- (1) One (1) paint line, identified as Line 1, with ~~three (3)~~ **two (2)** manual paint booths, identified as EU1, ~~EU2,~~ and EU32, respectively **and two (2) robot paint booths, identified as EU17 and EU18, respectively, equipped with dry filters for particulate matter control, exhausting to stacks S/V1, S/V2, S/V17, respectively, EU18 exhausts to S/V18a and S/V18b, capacity: 327 parts per hour, each. with a maximum capacity of 2.5 gallons/hour of paint, with each booth using dry filters for particulate matter control, and each booth exhausting to their respective stacks, identified as S/V1, S/V2 and S/V3.**

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

Located in Plant 1 (418 Stockwell Street, North Vernon, Indiana 47265):

- (1) One (1) paint line, identified as Line 1, with ~~three (3)~~ **two (2)** manual paint booths, identified as EU1, EU2, and EU32, respectively **and two (2) robot paint booths, identified as EU17 and EU18, respectively, equipped with dry filters for particulate matter control, exhausting to stacks S/V1, S/V2, S/V17, respectively, EU18 exhausts to S/V18a and S/V18b, capacity: 327 parts per hour, each.** ~~with a maximum capacity of 2.5 gallons/hour of paint, with each booth using dry filters for particulate matter control, and each booth exhausting to their respective stacks, identified as S/V1, S/V2 and S/V3.~~
- (2) One (1) paint line, identified as Line 2, with two (2) manual paint booths, identified as EU4 and EU5 respectively, with a maximum capacity of 2.5 gallons/hour of paint, with each booth using dry filters for particulate matter control, and each booth exhausting to their respective stacks, identified as S/V4 and S/V5.

Plant 1 utilizes HVLP, air atomized and electrostatic paint guns.

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 General Reduction Requirements for New Facilities [326 IAC 8-1-6]

- (a) The input VOC to Line 1 (EU1, EU2, ~~and EU~~**EU17 and EU18**) shall be limited to 24.0 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) month period. Compliance with this limit makes 326 IAC 8-1-6 not applicable.
- (b) The input VOC to Line 2 (EU4, and EU5) shall be limited to 24.0 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) month period. Compliance with this limit makes 326 IAC 8-1-6 not applicable.
- (c) Compliance with these VOC limits will also make 326 IAC 2-2 and 326 IAC 8-2-9 not applicable.

#### D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray from the surface coating booth stacks, S/V1, S/V2, S/V3, S/V4, ~~and S/V5,~~ **S/V17, S/V18a and S/Vb** while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

The equipment listed in the quarterly report form for Plant 1/Line 1 has been changed as followed:

Source Name:	Erler Industries, Inc.
Source Address:	418 Stockwell Street, North Vernon, Indiana 47265
Mailing Address:	PO Box 219, North Vernon, Indiana 47265
Part 70 Permit No.:	079-7572-00010
Facility:	Plant 1/Line 1 (EU1, EU2, <del>EU3</del> <b>EU17, EU18</b> )
Parameter:	VOC
Limit:	24.0 tons per year

### **Conclusion**

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 079-12803-00010.

Appendix A: Emissions Calculations  
VOC, HAP and Particulate  
From Surface Coating Operations

Company Name: Erler Industries, Inc.  
Address City IN Zip: 418 Stockwell Street, North Vernon, IN 46265  
MSM: 079-12803  
Pit ID: 079-00010  
Reviewer: Paula M Cognitore  
Date: October 5, 2

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
Line 1 EU-17 and EU-18																
ACL-L77	8.50	62.93%	0.0%	62.9%	0.0%	71.42%	0.00200	327.000	5.35	5.35	3.50	83.96	15.32	4.96	7.49	45%
AML-L9	8.00	76.99%	0.0%	77.0%	0.0%	53.00%	0.00250	327.000	6.16	6.16	5.04	120.84	22.05	3.63	11.62	45%

PM	Control Efficiency	99.00%				
	Uncontrolled		8.53	205	37.4	8.59
	Controlled		8.53	205	37.4	0.086

HAPS

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Glycol Ethers	Xylene Emissions (tons/yr)	Glycol Ethers (tons/yr)
Line 1 EU-17 and EU-18							
ACL-L77	8.50	0.00200	327.000	1.58%	20.00%	0.385	4.870
AML-L9	8.00	0.00250	327.000	4.49%	0.00%	1.286	0.00
Individual Total						1.67	4.87
Overall Total						6.54	

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)  
Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)  
Total = Worst Coating + Sum of all solvents used